

REQUEST FOR RECONSIDERATION
US APPLICATION NO. 09/348,575
ATTORNEY DOCKET NO. Q55017

REMARKS

Claims 1-15 are all the claims pending in the application.

Only claims 1 and 5 are rejected. These two claims are rejected under 35 U.S.C. § 102 as being anticipated by Saito. Prior to incurring the expense and trouble of taking an appeal, Applicant respectfully requests the Examiner to withdraw this rejection, for the following additional reason which the Examiner may not previously have gleaned from Applicant's arguments in favor of patentability.

The requirements of Independent claim 1 that Applicant will highlight during this discussion are shown below in bold text:

An Internet forwarding method, for forwarding internet packets from a host connected to an internet towards a destination host connected to a private internet network, where said internet network and said private internet network are coupled through at least one edge router, and where said destination host is assigned a global Internet address, said method comprising forwarding of said internet packets from one of said at least one edge router towards said destination host based only on said global internet address.

The point that the Examiner may not previously have appreciated is that the claim requires that the destination host be connected to a private Internet network. What makes a private Internet network a private network instead of just an Internet network is that the stations on the private network typically do not share the same numbering plan as the rest of the Internet; that is to say, the stations on the private network typically have their own internal Internet addresses, and the edge router typically performs some kind of network address translation so as to interface the stations of the private network with the rest of the Internet.

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The prior art Saito reference assigned each station of the so called private network its own global Internet address. Since every station in the Saito network is assigned its own global Internet address, the station can no longer be properly termed a private network. Instead, all of the stations are part of the public network because they share the same addressing scheme as the rest of the Internet. This kind of arrangement eliminates any requirement for network address translation.

In the invention as claimed in claim 1, the network is still a private network, but a global IP address is used for a destination station. The claim does not deal with how the global address is assigned to the particular destination station, and is ambiguous as to how long the assignment of the IP address lasts, and also does not deal with how the network handles the allocation and/or the allocation of a pool of global IP addresses. The claim does require, however, that the destination station is part of a private network. Therefore, not every station of the private network can have its own unique global Internet address.

Although the claim does not explicitly state all the foregoing points, it does explicitly state that the destination station is connected to a private Internet network. The term "private Internet network" as a well understood meaning in this field, and it carries with it a connotation that cannot be ignored. The Examiner's reading of the "private Internet network" on the Saito network (in which every single station has a global IP address) is respectfully submitted to be an improper interpretation of the express language of the claim. In particular, the interpretation is improper because it ignores the connotation of the limitation "private".

The foregoing points may also be made with respect to independent claim 5 in view of the several similarities between the language of independent claim 5 and independent claim 1.

For these reasons, therefore, Applicant renews the request to the Examiner to reconsider the current prior art rejection over Saito, and to withdraw the rejection. Applicant respectfully requests the Examiner now to consider the application to be in condition for allowance because claims 9-15 are allowed, and claims 2-4 and 6-8 were merely objected to as being dependent upon rejected base claims.

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In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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